EXHIBIT H

DECLARATION OF PETER GARZA

I, Peter Garza, hereby make the following declaration under penalty of perjury under the laws of the United States. I declare that the facts stated herein are true, correct and within my own personal knowledge. If called as a witness and sworn I could and will competently testify to these facts.

1. I am a Senior Vice President with First Advantage Litigation Consulting ("FADV"), a firm specializing in computer forensics and electronic discovery. Prior to joining FADV, I was the founder and President of EvidentData, Inc. ("EvidentData"), a computer forensics firm located in Rancho Cucamonga, California. I have worked as a computer forensics expert in hundreds of civil litigation cases. I have performed analysis of computer evidence in enterprise environments which have included investigation of computer intrusions, human relations issues, theft of trade secrets and trademark infringement, along with criminal investigations for the FBI, the Securities and Exchange Commission and other state and local law enforcement agencies. In hundreds of cases I have worked, both as a federal agent during the 1980's and 1990's and since then as expert consultant, I have worked in enterprise computing environments. I work with computer network and systems professionals at every level on a daily basis. My graduate degree is in MSMIS (Master of Science Management Information Systems) from Claremont Graduate University. I have recruited and trained analysts with Information Systems degrees. I supervise staff working in varied information technology ("IT") environments in many types of enterprises on a daily basis. During my work with the Department of the Navy working computer hacking and counter intelligence operations and more recently as an IT practitioner advising clients on security of enterprise networks, I work with network professionals and all levels of IT staff. I have worked on hundreds of civil litigation cases involving interacting with IT staff from executives responsible for global operations in large corporations, to working with computer technicians on

1 single-computer evidence issues. Cases on which I work that do not involve

2 computer networks are the exception rather than the rule. Very often I must assess

3 the skill level of client's or opposing party's IT staff to properly formulate

4 computer forensics preservation and analysis tasks.   A true and correct copy of

5 my resume is attached hereto as Exhibit 23.

6   2. In forming my opinions, I reviewed the following materials:

7   A. Deposition transcript of Amedeo Discepolo, dated February 20, 2008,

8   with exhibits 1-12;

9   B. Deposition transcript of Thomas Saranello, dated February 7, 2008,

10   with exhibits 1-8;

11   C. Deposition transcript of Carmelo Millan, dated January 16, 2008, with

12   exhibits 1-16;

13   D. Complaint and Jury Demand, case number 07 CIV 3769, May 11,

14   2007;

15   E. Citigroup Technology Infrastructure NISS Policies and Procedures

16   Manual, dated April 10, 2003, Version 1.7;

17   F. Citigroup Technology Infrastructure NISS Policies and Procedures

18   Manual, dated August 29, 2003, Version 1.8;

19   G. Amended Complaint and Jury Demand, case number 07 CIV 3769,

20   September 21, 2007;

21   H. Defendants' Memorandum of Law dated February 25, 2008;

22   I. Defendants' Statements of Undisputed Facts, dated February 22, 2008;

23   J. Printout of CertCities.com article titled "Cisco To Launch New CCNA

24   Exam, Add Two-Exam Option for Less-Experienced Candidates,"

25   dated June 23, 2003, attached as Exhibit 24;

26   K. Web page titled "Certifications Overview - IT Certification and Career

27   Paths - Cisco Systems," printed March 12, 2008, attached as Exhibit

28   25;

L. Web page titled "CCNA - Career Certifications & Paths - Cisco Systems," printed March 12, 2008, attached as Exhibit 26;

M. Web page titled "ICND - IT Certification and Career Paths - Cisco Systems," printed March 12, 2008, attached as Exhibit 27; and

N. Fluke Networks brochure for MicroScanner Cable Verifier, downloaded March 12, 2003, attached as Exhibit 28.

O. Systems Analysis and Design, Fourth Edition, Prentice Hall, by Kenneth Kendall and Julie Kendall, 2007. p. 5-6

P. Principles of Information Systems Management, Fourth Edition, Wm. C. Brown Communications, Inc., by Niv Ahituv, Seev Neuman and H. Norton Riley, 1994. p. 80-83

Q. Systems Analysis and Design An Object-Oriented Approach with UML, John Wiley & Sons, Inc., Alan Dennis, Barbara Haley Wixom and David Tegarden, 2002. p. 94-95

R. CCNA Cisco Certified Network Associate, Third Edition, Wiley Publishing, by Todd Lammle, 2008.

S. CCNA Exam Prep, Second Edition, Pearsen Education, Inc, by Jeremy Cioara, David Minutella and Heather Stevenson, 2008.

3. Mr. Carmelo Millan worked for Citigroup Technology, Inc. ("CTI") and Citigroup, Inc. ("Citi") (collectively referred to as "Citigroup") from about June 2000 until March, 2007. Mr. Millan's resume lists his position as "Network Analyst" from June 2000 until January 2003. From this position, Mr. Millan took the position of "Lab Coordinator", which he held until March of 2007. Review of the deposition transcripts listed above of Mr. Millan, Mr. Discepolo and Mr. Saranello reveal that the technical aspects of Mr. Millan's work involved a level of technical skill which, in my experience, is associated with support staff who operate computer systems and not that of a computer systems professional who designs or develops those systems. In designing or redesigning a system, a systems analyst

1   observes the interactions of the system within the organization and works with

2   developers on improvements.

3   *The systems analyst systematically assesses how businesses function by*

4   *examining the inputting and processing of data and the outputting of*

5   *information with the intent of improving organizational processes. Many*

6   *improvements involve better support of business functions through the use of*

7   *computerized information systems. This definition emphasizes a systematic,*

8   *methodical approach to analyzing – and potentially improving – what is*

9   *occurring with the specific context of the business... The three primary roles*

10   *of the systems analyst are: consultant, supporting expert and agent of*

11   *change. (See Paragraph 2O above, Kendall and Kendall)*

12   4. Based on my education and experience, a systems analyst applies expert-

13   level skills to develop a new system or assist with improvement of an existing

14   system. Systems analysis is not the day-to-day operation of the system. However,

15   it may involve observing the operation of the system and perhaps measuring its

16   performance to advise decision makers on improvements. In Paragraph 2P above,

17   Ahituv, et al., discuss a "Systems Approach to Information Systems Development

18   and Problem Solving." The authors outline a process that begins with defining a

19   problem in an information system and explain the major steps in arriving at an

20   implementation of the improved system. In Paragraph 2Q, Dennis, et al., also

21   discuss the systems analysis process and posit three steps: evaluating the existing

22   system, identifying the improvements and developing the new system. I have been

23   involved in this development process on a number of projects for systems used in

24   law enforcement, counter intelligence, and computer forensics. In addition, I have

25   worked with executive-level systems professionals in many of the hundreds of

26   cases in which 1 have been involved. I have applied systems analysis evaluation

27   techniques in defining electronic discovery and computer forensics projects. I have

28   also interacted with users and administrators of computer systems, like Mr. Millan,

1   in development projects as well as computer evidence consulting assignments.

2   Technicians, such as Mr. Millan who support the operation of systems may provide

3   input in the systems analysis process, but their role in operating the computer

4   devices within a system is not the same as the role of a systems analyst. Mr.

5   Millan's work with Citigroup entailed his applying technical skills to a set of tasks

6   defined by industry standards and specifications developed by higher-level

7   computer network engineers.

8   5. Based on my education and experience I observed that Mr. Millan's work

9   at Citigroup involved tasks that the industry considers low-level networking skills.

10 Mr. Millan's resume list tasks he performed in his position of "Network Analyst".

11 Mr. Millan's resume states that he would "Handle Help Desk calls regarding

12 network & network connectivity issues as well as application issues." He also lists

13 that he would "Handle the network connectivity and software checkout aspect of

14 moves, adds and changes to the company network." He goes on to list that he

15 responded to trouble reports ("trouble ticketing") and performed reporting for the

16 thirty eight floors of Citigroup's company network. These entries in Mr. Millan's

17 resume refer to responsibilities in performing basic configuration and

18 troubleshooting expected of any network support technician. Mr. Millan describes

19 the network environment as a "mixed DHCP/static, 10/100 switched Ethernet,

20 gigabit backbone environment". This refers to the most common networking

21 environment used with computers like those operating with Microsoft Windows.

22 DHCP refers to the automatic assignment of network address when the computer is

23 turned on. 10/100 Ethernet is the standard cable that connects the computers, and

24 gigabit is a standard transfer rate built into devices by the manufacturer. These are

25 all common standards implemented in most office environments. Mr. Millan's

26 work involved using devices that adhered to these standards with virtually no

27 additional configuration required.

28   6. Mr. Millan also states he performed tasks supporting Cisco routers and

1 switches along with connecting devices to network lines used to connect to remote

2 networks (OC3, ISDN, T1/T3, etc.). These network lines are normally provided by

3 a telecommunications company and network technicians connect devices like a

4 router to the end point on the company location. Mr. Millan's work with these

5 types of network lines would have involved him connecting the network line to the

6 Citgroup network via a device like a router.

7   7. The tasks Mr. Millan describes for his "Network Anaylst" position in his

8 resume are governed by established protocols much like a telephone technician

9 installing a phone system. The telephone requires a proper signal (dial tone in

10 analog phones) to make a call and, therefore, a phone must have a number assigned

11 which is associated with a subscriber account and the physical location. Network

12 devices, like the devices Mr. Millan supported, work on a basic set of protocols that

13 are designed by their manufactures and administered by network technicians. A

14 network engineer might decide what type of devices and their location on the

15 network and a network technician will implement those decisions. A telephone

16 repairman installing a phone or resolving issues does not design a new phone

17 system from the ground up. Although a network technician like Mr. Millan works

18 with a more varied set of physical devices, the network technician's application of

19 standard connections, configuration and location parameters is analogous to a

20 telephone technician's task of installing or repairing telephone systems.

21   8. Mr. Millan described the duties he performed in his position as "Lab

22 Coordinator/Network Engineer" for Citigroup ending in March of 2007. My

23 review of the tasks Mr. Millan listed in this portion of his resume indicates he

24 continued to install, configure and troubleshoot network devices. The "build out"

25 of the "Lab/Development Data Center" listed in Mr. Millan's resume and discussed

26 in his deposition involved a higher volume of computer servers and devices moved,

27 acquired or installed in the Lab. These tasks involved the same type of technical

28 support functions he performed as a network analyst.

9. In my experience in information systems working in many business environments as an expert consultant in computer forensics, I have observed that what are routine technical tasks to a computer technician may be perceived as overly complex and sophisticated to a layperson unfamiliar with the industry. Mr. Millan testified he completed the Cisco ICND ("Interconnecting Cisco Networking Devices") examination and received the Cisco CCNA ("Certified Cisco Network Associate") certification. The ICND is a test administered as part of the CCNA certification. The ICND is not itself a certification. Cisco is a manufacturer of enterprise networking devices which also provides three levels of certification: Associate, Professional, and Expert. Both Cisco and industry experts describe the CCNA as an entry-level certification for technicians new to networking. Lammle (Paragraph 2R above) states that Cisco certification can help you get your first networking job. This CCNA exam preparation book begins with basic networking concepts and goes on to describe many of the types of tasks Mr. Millan performed at Citigroup. I reviewed Lammle's description of the CCNA material and in my experience it is consistent with the entry level tasks performed by Mr. Millan. I reviewed another CCNA preparation by Cioara, et al. (Paragraph 2S above) which states "The Cisco Certified Network Associate (CCNA) accreditation has become the leading introductory-level network certification available today."

10. Review of the Cisco learning web site showed that the "CCNA certification validates an individual's *"ability to install, configure, operate and troubleshoot medium-sized routed and switched networks, including implementation and verification of connections to remote cities in a [Wide Area Network]."*" This excerpt from the Cisco Systems "CCNA - Career and Certifications" page (Paragraph 2L above) goes on to state *"...curriculum includes basic mitigation of security threats, introduction to wireless networking concepts and terminology, and performance-based skills. This new curriculum also includes (but is not limited to) the use of these protocols: IP, Enhanced Interior Gateway*

Routing Protocol (EIGRP), Serial Line Interface Protocol Frame Relay, Routing

Information Protocol Version 2 (RIPv2), VLANs, Ethernet, access control lists

(ACLs)." Cisco's depiction of the CCNA certification confirms it is not an

advanced networking certification. The Cisco Learning website provides

information about their three levels of certification. The Associate level attained by

Mr. Millan in completing the CCNA is considered only slightly above the Certified

Cisco Entry Network Technician ("CCENT") shown in Graphic 1, which shows

Cisco's graphic representation of these lower level certifications below the

Professional and Expert advanced-level certifications (Paragraph 2 L above). As

indicated in Graphic 1, Mr. Millan's CCNA certification is only an entry-level

networking certification.

　　11. The Cisco web site has another page titled

"Certifications Overview - IT Certification and Career

Paths" which further describes the CCNA certification as

an "apprentice or foundation level" certification:

Graphic 1

"Think of the Associate level as the apprentice or foundation level of networking certification."

　　12. Further, the Cisco Learning website lists a June 2003 article on the

information technology ("IT") certification web site CertCities.com (Paragraph 2J

above) titled "Cisco to Launch New CCNA Exam, Add Two Exam Option for Less

Experienced Candidates" pertaining to a new version of the ICND exam for CCNA

certification. This article emphasizes Cisco's intent to attract entry-level candidates

to the CCNA certification, and further illustrates that the CCNA is not "advanced

networking certification."

　　13. All the tasks that Mr. Millan performed and mentioned above for the

CCNA, are well defined tasks that adhere to industry or Cisco standards. The

CCNA trade certification ensures that technicians are aware of set protocols for

1 operating Cisco networks.

2   14. The items listed in paragraph 2 above and

3 which I reviewed, reveal that Mr. Millan worked on

4 troubleshooting and resolving network problems. My

5 review indicates that these network problems primarily

6 involved issues with connections to the network.

7 Among the tools Mr. Millan used in troubleshooting

8 network connections were telephone "butt sets." This

Graphic 2

9 simple device, depicted in Graphic 2, obtained from the Cisco web site, is

10 commonly used to test telephone lines. Based on my training and experience as a

11 federal agent working on computer hacking cases, I am aware one can clip the butt

12 set leads to a pair of telephone wires or contacts to test the telephone line. This

13 device is commonly used by telephone repairmen to test connectivity of phone lines

14 and is a simple task requiring minimal training or experience

15   15. A Microscanner, which was another device mentioned in the testimony I

16 reviewed, was also used for testing network connectivity. This device, made by

17 Fluke Networks, is used to verify that there are no faults in network cables. The

18 Microscanner device uses a simple interface that allows technicians to do a battery

19 of tests. (Paragraph 2N above). Devices like the butt set and the Microscanner are

20 used to determine if network and telephone cabling are operating within set

21 parameters. Mr. Millan would have used these testing devices along with the other

22 network testing devices he mentioned (fiber testers, Mod-Taps and Fluke meters) in

23 accordance with established industry standards.

24   16. Based upon a review of the deposition transcripts Citigroup engineers

25 designed the Citigroup network and Mr. Millan provided technical support. This

26 support was often in the form of testing a physical run of cable. As a carpenter

27 might provide feedback to an architect in the implementation of a design, so did

28 Mr. Millan apply his on-site knowledge in the physical execution of an engineer's

network design. Mr. Millan checked the physical layout of a "stack" of computers

(multiple computers vertically placed in a rack designed for that purpose) in a

server room. He also checked network devices on user's desks. He was tasked with

ensuring that the physical length of cable did not exceed established standards. The

Institute of Electrical and Electronic Engineers ("IEEE") has determined the

maximum length for the type of network cable used by Citigroup (Ethernet

10BaseT) is 100 meters (Paragraph 2S above, p. 89). Mr. Millan's task of checking

server stacks or placement of network devices was to ensure cable lengths did not

exceed this approximate 330 foot maximum length standard.

17. Mr. Millan testified that he was responsible for ensuring network

connectivity for Citigroup users. This entailed establishing and/or checking that a

Citigroup employee or group of employees had a network connection from their

computer workstations. This involved creating a connection from the device in

question, for example a personal computer ("PC") on a user's desk, to the Citigroup

local area network ("LAN"). In the most basic form, a technician creates a LAN by

connecting a cable to a personal computer or other device and running the cable to a

hub (a device with multiple sockets for network cable connections) located in the

same office. If the office required connection to the Internet or a corporate

network, the technician would connect a cable from the hub to a router which is

connected to the Internet or the corporate network. A corporate network is an

example of a wide area network ("WAN") which connects multiple locations as

opposed to a LAN which is limited to a single location. The router directs network

communications to either computers on the office LAN, the Internet or the

corporate WAN, as appropriate. The ports on the hub simply provide the

connection for the cable. The ports on the hub look much like traditional phone

jacks only a bit larger. Network cables have four pairs of wires (eight wires)

compared to the two pairs of wires in traditional telephone cables. A network

segment for an office or a floor of a building is created by connecting cables to the

1 hub and connecting the other end of the cables to the devices. This creates a

2 physical local area network.

3   18. In his testimony, Mr. Millan

4 explained he supported Cisco switches. A

5 switch performs a function similar to a hub

6 (described above) by providing a connection to

7 multiple devices on a network, but has enhanced

8 features. Like a hub, a switch has ports for

9 connecting network cables which connect

Graphic 3

10 devices on the network. The devices connected to   a

11 hub are on one LAN. In contrast, a switch can separate connected devices into

12 multiple LANs even though they are physically connected to the same switch. By

13 using settings in the software on the switch, groups of devices are separated into

14 virtual local area networks ("VLAN").

15   19. The device depicted in Graphic 3 is a Cisco 5500 switch. This type of

16 switch is among the types of devices Mr. Millan supported. Mr. Millan's duties

17 involved plugging cables into the switch and verifying that the connection was

18 operating properly, by using one of the testing devices listed above. Mr. Millan's

19 duties also included requesting changes to the settings on these switches. Changes

20 involved assigning a network address to the ports or simply turning them on and

21 off. Early in his position of Network Analyst, Mr. Millan and other technicians at

22 his level were allowed to connect to the Citigroup's Cisco switches and use

23 standard text commands to make changes to ports on the switch. The Citigroup

24 switches Mr. Millan supported operate under the Cisco IOS (Internetwork

25 Operating System) which implements a standard set of text-based commands to

26 change settings on a Cisco switch.

27   20. Mr. Millan and Mr. Saranello testified that the ability to make these

28 changes in the Cisco switches was assigned to a higher level technician early in Mr.

1 Millan's position as Network Analyst. Thereafter, Mr. Millan testified he entered

2 these requests for changes in a database systems used to track these settings. I

3 reviewed the April and August, 2003 copies of the Citigroup Technology

4 Infrastructure NISS Policies and Procedures Manuals (listed above in Paragraph 2E

5 and F). In a task described as a "Layer 2 Switch Port Change Request" a technician

6 is guided through the process of requesting a change to switch port settings. Mr.

7 Millan testified that he entered the request for changes to port switches with this

8 Citigroup system. Mr. Millan's data entry tasks for requesting changes are another

9 example of low-level technical support tasks.

10   21. Mr. Millan's duties as "Network Analyst" and "Lab Coordinator" with

11 Citigroup did not involve systems analysis or design of the networks which

12 involved Cisco devices. His duties were technical support functions to ensure that

13 the physical equipment that attached the devices on the Citigroup network, operated

14 within set parameters and according to set procedures. In Mr. Millan's later

15 position as Lab Coordinator, his technical role was supporting the physical

16 connectivity of the network, which involved a greater number of devices, but the

17 technical level of his duties remained the same.

18   22. In reviewing the deposition transcripts, among the tasks Mr. Millan

19 performed was creating spreadsheet-lists of inventory and the elevation drawings

20 and the connectivity database. This did not involve computer programming as the

21 term is understood in the computer industry. I have worked on computer software

22 development projects and worked with programmers in the software that I use and

23 software I have helped develop. Computer programming involves writing code in a

24 programming language. The programming code is a set of instructions which

25 determine how the program operates. Programs like Microsoft Excel, which Mr.

26 Millan used for creating lists of inventory, are simple to use programs requiring

27 only basic skills for the most common tasks. In my experience working in the

28 industry as a user, as a trainer in computer forensics, and managing software

1 development projects, I have used Microsoft programs for many years and have

2 used systems analysis tools to design database systems. I know that Microsoft

3 Excel is not used for computer programming. I have performed systems analysis

4 and design work executed by programmers in standard programming languages.

5 Although programs can be written by programmers which interact with Microsoft

6 Excel, my review of the deposition transcripts indicates the database tasks

7 performed by Mr. Millan involved the creation of basic databases based on

8 established templates. He did not do computer programming or use systems

9 analysis skills to design complex databases.

10   23. I reviewed the performance evaluations of Mr. Millan, Mr. Millan's

11 resume, the deposition testimony of witnesses along with Defendants' Statements

12 of Undisputed Facts and observe that Mr. Millan's technical duties with Citigroup,

13 both in his earlier position as a Network Analyst and later as a Lab Coordinator

14 involved technical support functions. The CCNA certification he had obtained is

15 considered by the industry leader, Cisco, as an entry-level certification involving

16 the types of technical tasks Mr. Millan performed at Citigroup. The work Mr.

17 Millan performed as a computer employee with Citigroup did not involve systems

18 analysis techniques or procedures as the term is understood in the information

19 systems industry. Although Mr. Millan did consult with users, it was not to

20 determine system specifications. Mr. Millan's interaction with users was in the

21 application of well-established procedures and industry standards applied to the

22 placement of network devices and resolving connectivity issues.

23   24. Mr. Millan's duties with Citigroup did not involve computer systems

24 design. In the material I reviewed it appears that Mr. Millan may have reviewed

25 network designs prepared by network engineers and provided input regarding his

26 knowledge of the physical placement of devices, however, he did not create the

27 network designs or specifications. My review of the documents listed above

28 revealed that Mr. Millan's duties did not involve performing systems analysis and
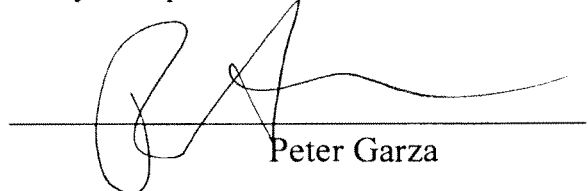
1 design. Mr. Millan's duties included using simple databases, not designing them.

2 Mr. Millan's duties early in his position with Citigroup involved connecting to

3 Cisco switches and issuing Cisco Internetwork Operating System (IOS) commands

4 not designing changes to the operating system. Based on my education, experience

5 and training as a systems analyst, IT practitioner and computer forensics consultant,

6 it is apparent to me that the combination of duties performed by Mr. Millan are

7 common technical tasks routinely performed by low-level technicians who are not

8 involved in systems development.

9 //

10 //

11 I declare under penalty of perjury that the foregoing is true and correct. Executed at

12 Rancho Cucamonga, California on this 15th Day of April, 2008.

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15   Peter Garza

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Peter Garza • Curriculum Vitae
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Professional Experience

First Advantage Litigation Consulting – Senior Vice President   *October 2006 to present*
EvidentData, Inc. – President & Founder   *November 1999 to October 2006*

Peter Garza is Senior Vice President of First Advantage Litigation Consulting, specializing in computer forensics, electronic discovery, expert consulting. Mr. Garza has worked as an expert consultant in hundreds of civil cases, including lawsuits against Arthur Andersen and the Board of Directors of Enron, and a successful $45 million lawsuit by sports agent Leigh Steinberg. Case assignments have included working as an independent expert, court-appointed special master, or otherwise advising courts on computer forensics and electronic discovery matters.   Mr. Garza founded EvidentData, which was acquired by First Advantage in 2006. Mr. Garza continues to lead his team of computer forensics experts in a wide array cases.

Naval Criminal Investigative Service – Special Agent   *March 1989 to November 1999*

Mr. Garza worked as a special agent with the Naval Criminal Investigative Service (NCIS), where he recovered and analyzed a wide array of computer evidence, including electronic business records used to expose defense procurement fraud, as well as electronic evidence used in successful criminal and counterintelligence investigations. As an agent with NCIS, Mr. Garza conducted the first court-ordered Internet wiretap in the United States while investigating the "El Griton" hacker case. The Argentine was convicted of using Harvard University's computer network as a staging point to hack in to computer networks at the Department of Defense, NASA, and other U.S. and foreign research sites.

Expert Consulting

- Expert Consulting in Computer Evidence Protocols
  As an independent expert, Mr. Garza is often called upon to craft or review proposed protocols for the review of a producing party's enterprise systems, and balance production obligations with the protection of proprietary and sensitive information.

- Computer Forensics and Electronic Discovery Consulting
  Routinely works with companies and their counsel, from pre-litigation investigation through to trial. Assists with identifying the universe of data, and then preserving and investigating relevant sources of electronic evidence.

- Special Master/Independent Expert for Court
  Works as a special master or independent expert in electronic evidence. Works with litigants to resolve electronic evidence issues ranging from crafting acceptable computer evidence acquisition protocols, acceptable search and analysis protocols, along with proper privilege review by legal staff and method of production to opposing party.

- Expert Testimony
  Has qualified as a testifying expert in computer forensics in federal and state courts. Cases have included testimony regarding operating system and software artifacts recovered in computer forensic analysis, testimony to show the failure to produce data, testimony in the analysis of metadata of questioned documents, and testimony regarding indicators of the use of evidence destruction software.

Case Examples

- Electronic Discovery Consulting in Large Production
  Consulted with a healthcare provider who had used IT vendor to collect computer media across many locations with a large number of users. With a deadline looming, worked with outside counsel to plan and execute the processing of over one thousand items of electronic media with sparse information from IT vendor.

- Independent Expert in Theft of Trade Secrets Case
  Developed protocol to properly acquire evidence within defendant's enterprise and perform forensic analysis. Identified proprietary information at issue in litigation, removed plaintiff's data from defendant's systems, and reported findings to court.

- Computer Forensics in Contract Dispute
  Examined metadata in questioned documents. Metadata analysis showed opposing expert had missed crucial data, and that metadata showed documents had been edited as plaintiff claimed.

- Computer Forensics in Theft of Trade Secrets
  Recovered remnant data which confirms theft of proprietary data by former employees of technology company. Inspection order is obtained and additional evidence is recovered from defendant's computers further confirming the theft.

- Expert Consulting in Production to Government Agency
  Worked with client's counsel to respond to Department of Justice investigation. Directed forensic analysis of relevant user workstations. Met with Assistant U.S. attorney and successfully refuted charge of tampering with electronic evidence.

- Computer Incident Response and Remediation
  Investigated report of compromise of popular web commerce site. Directed investigation, assisted with reporting to appropriate jurisdiction, and consulted on remediation plan.

- Internet Investigations - Prepared and executed the first court-ordered wiretap on an Internet connected network, exposing an Argentine computer hacker using Harvard University's network to compromise research-facility computer networks at the Department of Defense, NASA, and elsewhere around the world. The case was publicized by U.S. Attorney General Janet Reno in March 1996.

Other Relevant Experience

- Designed forensic protocols for computer forensic labs which he continues to manage

- Provides industry and CLE presentations to law firms and conferences
- Directs internal, and evaluates external, training programs to develop analyst staff in computer forensics

Education

- Master of Science in Information Systems, Claremont Graduate University, 2001
- Bachelor of Business Administration, National University, 1988

Teaching

- California State Polytechnic University, Pomona, 2004
  - Graduate level course in advanced computer forensics in Computer Information Systems Department

- Computer Security Institute, 2001-2002
  - Management of Information Technology Investigations
  - Technical recovery of Electronic Evidence

Training

Coursework successfully completed in investigative and computer-evidence topics including: criminal investigations, advanced interviewing, International Association of Computer Investigative Specialists computer seizure and computer-forensics examination, network-intrusion detection, Novell Networking Technologies, UNIX system administration, and Federal Law Enforcement Training Center Telecommunications Fraud and Computer Evidence Analysis Training Programs. Forensics software vendor training courses.

Recent Expert Deposition and Trial Testimony

- Bowlby, Laurie vs. McKernan, Mackenzie Scott, Case No. RFL-043564 (Superior Court, County of San Bernardino, California), May 2006.

- Caruso Affiliated Holdings, LLC vs. General Growth Properties, Inc., Case No. EC 038518 (Superior Court, County of Los Angeles, California), July 2007.

- Seth D. Bulow, M.D. vs. North County OB-GYN Medical Group, Inc., Case No. GIC 854573 (Superior Court, County of County of San Diego), September 2007.

* A complete list of cases in which Mr. Garza has provided trial or deposition testimony as a computer forensics expert available upon request.

Professional Memberships

- High Technology Crime Investigation Association, Past President Southern California Chapter
- International Association of Computer Investigative Specialists
- Forensic Expert Witness Association

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News

Cisco To Launch New CCNA Exam,A dd Two-Exam Option for Less-Experienced Candidates

6/23/2003 -- This week ati ts Networkers conference in Orlando,C isco Systems will announce a new Cisco Certified Network Associate (CCNA) exam,6 40-801,t o launch June 30.

The current CCNA exam (640-607),w hich debuted in March 2002,i ncludes understanding the functions and operations of local area networks (L N), Cisco IOS fundamentals, wide area networks (WAN), virtual private networks (VPN), and Storage Area Networks (SAN). Othert opics covered are IP Addressing,C isco Command Line Interface (CLI), Routing and Switching technologies and protocols.(*Editor's Note:T CPmag.com provides a review oft his exam, written by CCNP Andy Barkl, here.*)

Nader Nanjiani, marketing programs manager of the InternetL earning Solutions Group at Cisco, said the 801 version of the CCNA exam has been   dated to cover switching configuration, Open ShortestP ath First (OSPF) and Enhanced Interior Gateway Routing Protocol (EIGRP)p rotocols, and variable length subnet masking.

"This exam is more in-depth than 607, nota reduction," he commented. "These topics were already included in the ICND class that we're teaching now... [So] anyone who's taken the [Interconnecting Cisco Network Devices) course that was already out,[he or she] should be able to pass the new exam,b ecause now [the exam]c overs the chapters that weren't necessarily covered before."

The 640-607 exam is scheduled to retire Sept. 30, although can   dates will be able to take the exam into early October as long as they schedule the test by the earlierd ate.

Att he same technical conference for Cisco professionals, the company will also announce a new two-exam approach to the CCNA.

According to Nanjiani,t he two new exams --I NTRO 640-821 and ICND 640-811 -- cover exactly the same contenta s the soon-to-debut 801 exam, but the information is split,w ith higher-level content in the ICND, and lower-level content in INTRO. "Now you have the option of taking a single exam if you can handle the contenti n one fell swoop... or piecemeal if you wantt o take more time," Nanjiani explained.

The INTRO testi s currently available in beta form as 641-821.N anjiani estimated thati t would be available in live form in eight to 12 weeks. A corresponding course will be available later in July.T he ICND exam will be available on June 30. Each exam will be valid for three years.

Nanjiani said that candidates will be able to choose for themselves which CCNA path to take; Cisco is only recommending that those with less networking experience choose the two-exam option." We were hearing from our raining partners that people were coming to the ICND class and having a difficult time keeping up... they didn't have the networking background," he explained." No one is going to stop you, but [the INTR exam]i s a way for an individual to see how he or she stands before jumping into the ICND courses."

With the two-exam approach,c andidates need to take the required ex   s within three years of each other to earn their CCNA. Both exams are 30 minutes shorter than the typical Cisco exam (60 minutes vs. 90 minutes) and will cost $100 each as opposed to the standard $125.

Passing either the ICND or INTRO exams alone does note arn the candidate any title, Nanjiani said, although current CCNAs will be allowed to use the new ICDN exam as a renewal requirement.

Nanjiani said that the company may consider offering a similar two-exam path for its Cisco Certfied Design Associate (CCDA) title, depending on customer feedback.
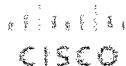
More information on these announcements should be published on Cisco's Web site here on Tuesday. -Becky Nagel, Dian L. Schaffhauser

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CISCO

IT Certification and Career Paths

Certifications Overview

GeneralC ertifications and Focused Certifications

The firsts tep in general Cisco Career Certifications begins either with CCENT as an interim step to Associate level, or directly with CCNA for network operations or CCDA for network design.T hink oft he Associate level as the apprentice or foundation level ofn etworking certification.

General Certifications: Three Levels of Certification

- Associate:T he first step in Cisco networking begins at the Associate level, which also includes CCENT, an interim step to Associates for those with little job experience. Think of the Associate level as the apprentice or foundation level of networking certification.

- Professional. This is the advanced or journeyman level ofc ertification.

- Expert.T his is CCIE,t he highest level of achievementf or network professionals, certifying an individual as an expert or master.

General Certifications: Six Different Paths

- Routing and Switching: This path is for professionals who install and support Cisco technology-based networks in which LAN and WAN routers and switches reside.

- Design: This path is aimed at professionals who design Cisco technology-based networks in which LAN and WAN routers and switches reside.

- Network Security: This path is directed toward network professionals who design and implement Cisco Secure networks.

- Service Provider:T his path is aimed atp rofessionals working with infrastructure or access solutions in a Cisco end-to-end environmentp rimarily within the telecommunications arena.

- Storage Networking:T his path is for professionals who implement storage solutions over extended network infrastructure using multiple transport options.

- Voice: This path is directed toward network professionals who install and maintain Voice solutions over IP networks.

Focused Certifications: Specialist

A variety of Specialistf ocused certifications are available to show knowledge in specific technologies, solutions,o r job role. New certifications are added to this list regularly.

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Recent Program Information

Recent Articles

Read what industry publications are saying about Cisco Career Certifications.

Current	2007	2006	2005	2004	2003

Dec 03	Certification Magazine - Paying Off Nicely - CertMag's 2003 Salary Survey ☞ "From entry-level programs like CompTIA's A+ to advanced certifications like the Cisco Certified Internetwork Expert (CCIE), each certification program studied provided a noteworthy salary to IT experts."
11 Nov 03	CertCities Online - Cisco IP Telephony Certs Double in 2003 ☞ "Cisco Systems announced today that the number of IT professionals holding its IP telephony-related specialty certifications 'more than doubled' from December 31,2 002, to July 1, 2003."
05 Nov 03	TMCnet.com - Customer Satisfaction, Italtel Ranks Among The First Companies In EMEA ☞ "Italtel,o ne of the world's leaders in integrated voice, data and video tlc networks, ranked third among system Integrators in EMEA and firsta mong companies operating with service providers, in terms of customer satisfaction.T his is the outcome of a survey conducted by Cisco Systems which assessed Italtel's performances through thirty questions placed to the most qualified service providers and network operators in EMEA."
04 Nov 03	CertCities.com - CCIE Program Celebrates 10th Anniversary ☞ "When Cisco launched the CCIE in Nov. 1993,i t was Cisco's first certification program. The company later added other professional- and associate-level titles, such as the Cisco Certified Network Associate (CCNA) and the Cisco Certified Network Professional (CCNP)."
28 Oct 03	CertCities.com - Cisco Extends 2 Betas ☞ "Cisco Systems recently extended the life of two beta exams: 643-531 CSIDS, which counts toward the company's Cisco Certified Security Professional (CCSP) title, and 641-821 INTRO, which is part oft he new two-exam Cisco Certified Network Associate (CCNA) track."
21 Oct 03	NetworldWorld Fusion - A Place for CCIEs to Convene ☞ "Cisco this month officially launched a free resource to help your IT staffers do their jobs better - the Cisco Certifications Community."
09 Oct 03	Enterprise Networks & Servers - Cisco Offers Certification Site ☞ "Cisco Systems has officially launched the Cisco Certifications Community, a knowledge sharing portal exclusively for Cisco certified individuals."
30 Sep 03	SearchNetworking.com - Cisco Reports Ramp-up in IP Telephony Certs ☞ "Cisco Systems Inc. recently announced thatt he number of IP telephony certifications it issued between Dec. 31, 2002, and July 2003 was equal to the number of all IP telephony certs the company had previously issued."
29 Sep 03	NewsFactor Network - Tech-Job Certifications That Still Matter ☞ "For IT professionals looking to advance their career or move into another specialty tech certifications present a quandary In these

post-boom years,m ost IT professionals now know that certification does not equal employment and a high salary. All those tests and fees have become a turnofff or many."

16 Sep 03   Enterprise Networks & Servers - Cisco Networking Academy Launches Security and Wireless Curricula 🗗
"After an initial pilot phase that attracted over 250 Academy participants, the Networking Academy program is launching the courses globally."

15 Sep 03   CRN Online - Vendors Can Influence VAR's Certification Training Decisions 🗗
"While there is little difference across solution provider size for the Microsoft MSCE or Cisco CCNA certifications, there are distinct differences in other cases."

10 Sep 03   The Register - Cisco CCNA Self-Study Guides 🗗
"Cisco Systems has introduced a new CCNA certification, with two paths to attain that valued title."

09 Sep 03   CertCities Online - Cisco Renames CCIE, Communications and Services 🗗
"The company said in a Web site statement that the renaming aligns the credential more closely with the segment of the IT community that it serves."

Sep 03   Certification Magazine - Cisco Exam Study Strategies 🗗
"Given thatC isco's is one of the three biggestI T certification programs, and that exam preparation material is readily available to candidates, an organized program of study is the best approach to tackling any Cisco certification exam."

22 Jul 03   TCPmag.com - Cisco Launches Updated CCSP Exams 🗗
"Several of the updated exams also countt oward the company's security-related Cisco Qualified Specialist titles,w hich candidates can earn on their way to pursuing the CCSP or individually."

25 Jun 03   Certification Magazine - Certifiably Secure: Cisco Certified Security Professional (CCSP) 🗗
"As Cisco's newest professional levelc ertification, the CCSP has attracted a great deal of interest and attention in the marketplace."

23 Jun 03   Certcities - Cisco to Launch New CCNA Exam, Add Two Exam Option for Less Experienced Candidates 🗗
"This week at its Networkers conference in Orlando,C isco Systems will announce a new Cisco Certified Network Associate (CCNA) exam,6 40-801,t o launch June 30."

18 Jun 03   Certification Magazine - Cisco Expands Security Certification and Training Portfolio 🗗
"Cisco Systems Inc. announced the expansion ofi ts security certification and training program to reflect the latest advances in Cisco security technology and industry expectations for IT professionals."

17 Jun 03   Certcities - Cisco Debuts Security Design Courses, Considering Cert 🗗
"Now [students] can see different designs...[what will happen,f or example] when you but the firewall in series with the VPN or in parallel."

20 May 03   Yahoo! Financial - Cisco Enhances Career Certifications Tracking System 🗗
"Cisco Systems,I nc.® today announced enhancements to the Cisco Career Certifications Tracking System, a secure database that provides a record of exam history and certification progress for Cisco career-certified professionals worldwide."

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CISCO

IT Certification and Career Paths
640-811 ICND

Interconnecting Cisco Networking Devices Exam

Retired November 6, 2007

Exam Number:	640-811
Associated Certifications:	CCNA
Duration:	60 minutes (40-50 questions)
Available Languages:	English
Click Here to Register:	Pearson VUE
Exam Policies:	Read current policies and requirements
Exam Tutorial:	Review type of exam questions

Exam Description   Exam Topics   Recommended Training   Additional
Resources

Exam Description

The ICND exam is one of the two qualifying exams available to candidates
pursuing a two-exam option for the Cisco Certified Network Associate CCNA
certification. The ICND (640-811) exam will test materials from the new
Interconnecting Cisco Network Devices (ICND) course. The exam will certify that
the successful candidate has important knowledge and skills necessary to select,
connect, configure, and troubleshoot the various Cisco networking devices. The
exam covers topics on Extending Switched Networks with VLANS, Determining
IP Routes, Managing IP traffic with Access Lists, Establishing Point-to-Point
connections, and Establishing Frame Relay Connections.

Exam Topics

The following information provides general guidelines for the content likely to be
included on the exam. However, other related topics may also appear on any
specific delivery of the exam. In order to better reflect the contents of the exam
and for clarity purposes the guidelines below may change at any time without
notice.

Planning and Designing

- Design or modify a simple LAN using Cisco products
- Design an IP addressing scheme to support classful, classless, and private
  addressing to meet design requirements
- Select an appropriate routing protocol based on user requirements
- Design a simple internetwork using Cisco products
- Develop an access list to meet user specifications
- Choose WAN protocols to meet design requirements

Implementation and Operations

- Perform an initial configuration on a switch
- Configure routing protocols given user requirements

- Configure IP addresses,s ubnet masks, and gateway addresses on routers and hosts
- Configure a router for additional administrative functionality
- Configure a switch with VLANS and inter-switch communication
- Implementa LAN
- Customize a switch configuration to meet specified network requirements
- Implementa ccess lists
- Implements imple WAN protocols

Troubleshooting

- Utilize the OSI model as a guide for systematic network troubleshooting
- Perform LAN and VLAN troubleshooting
- Troubleshoot routing protocols
- Troubleshoot IP addressing and host configuration
- Troubleshoot a device as part of a working network
- Troubleshoot an access list
- Perform simple WAN troubleshooting

Technology

- Describe the Spanning Tree process
- Evaluate the characteristics ofL AN environments
- Evaluate the characteristics ofr outing protocols
- Evaluate rules for packet control
- Evaluate key characteristics of HDLC, PPP, Frame Relay, DDR,a nd ISDN technologies

Recommended Training

Interconnecting Cisco Networking Devices (ICND) is the recommended training for this exam.

Courses listed are offered by Cisco Learning Partners, the only authoriz d source for Cisco IT training delivered exclusively by Certified Cisco Instructors. Check the Global Learning Partner Locator for a Cisco Learning Partner near you.

Additional Resources

A variety of Cisco Press titles may be available for th s exam. These titles can be purchased through the Cisco Marketplace Bookstore, directly from Cisco Press.

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FLUKE networks.

MicroScanner² Cable Verifier
Raising cable verification to a higher power

For more than a decade, cabling installation and maintenance technicians have relied on MicroScanner to verify terminations and troubleshoot continuity faults. A lot has changed in the cabling world since the original MicroScanner was introduced. Industry economics require that installations be done fast and accurately with no callbacks. And converging voice, data, and video technologies have given rise to new requirements for service testing and multimedia support.

MicroScanner² recognizes these trends and presents a much-needed revolution to the way testing is done. It streamlines every aspect of the verification job. From its time-saving user interface and integrated multimedia support to its expanded service detection capabilities, MicroScanner² gives technicians the power to perform their jobs faster and more accurately than ever.

High power vision to verify voice/data/video cabling and services. That's Network SuperVision.™ That's Fluke Networks' promise to you.

Reduce test time and user error
Yesterday's cable verification testers force users to toggle between different modes (up to four) to view all test results. This not only slows the test process, but also causes user frustration and error. MicroScanner² has defied this convention by displaying key test results – wiremap, pair lengths, distance to fault, cable ID, and far-end devices – all on one screen.

Eliminate awkward test adapters
Tired of losing or breaking all the adapters needed for testing the various voice, data, and video media types? MicroScanner² makes these adapters things of the past with built-in RJ11, RJ45, and coax support. Both the main unit and the far-end identifiers can be used to test telephone jacks, Ethernet jacks, and CATV outlets right out of the box.

Rule out service problems fast
Today's communications technicians have more problems to deal with than just the cabling. They have to rule out a whole host of cable and service issues before determining the cause of a connectivity problem. Is there telephone voltage? What's the polarity? Is there a switch at the far end? Is PoE available? MicroScanner² gives technicians high power vision to verify today's most common voice, data, and video services.

Locate elusive cables in seconds
MicroScanner² features built-in IntelliTone digital and analog toning to precisely locate
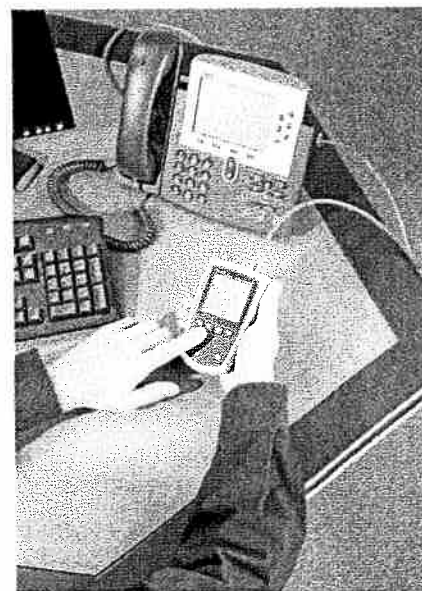
virtually any cable or wire pair, regardless of work environment. Use digital mode to locate high-grade data cabling (Cat 5e/6/6a) in bundles, or at switches, patch panels, or wall outlets. Or, use analog mode on voice-grade cabling (Cat 3 and below), as well as coax, security/alarm, and speaker wiring.

Repair or replace tools less often
With all the abuse you put your tools through, you can't afford for them to be delicate. MicroScanner² features a rubber wrap-around holster that makes it the right tool for even the toughest jobs. Toss it into your toolbox. Drop it from a ladder. It can handle it. Plus, it now comes standard with a vinyl carry pouch for enhanced protection and convenience.

Technical Data

High power vision into voice/data/video cabling

FLUKE networks

MicroScanner² Cable Verifier

Wiremap adapter doubles as protective cap

Modular port accepts RJ45 and RJ11 plugs

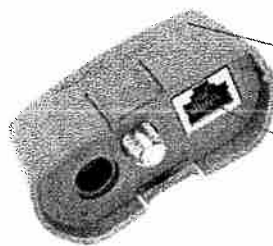**Coax connector** for video and audio testing

Rubber holster enhances durability and grip

Digital toning is safe and effective on active networks

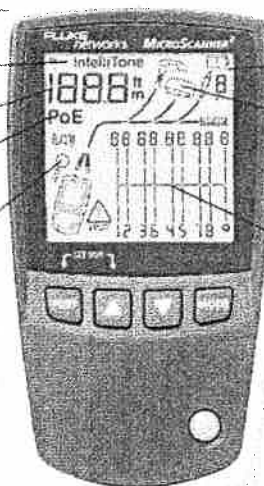**Length meter** shows distance to termination, open, or short

PoE detection rules out insufficient power as source of problems

Detail mode gives additional test status information

Oversized LCD is backlit for crystal clear results

Intuitive icons show what's at the far end of any cable (10/100/1000 switch, POTS service, short, cable ID)

Graphical wiremap shows type and location of fault (miswires, reversals, split pairs, shorts, breaks)

Ordering Information

Model	Description
MS2-100	MicroScanner² Cable Verifier
MS2-KIT	MicroScanner² Professional Kit

Accessories	Description
MS2-IDK27	MicroScanner² Remote Identifier Kit #2-7
MT-8200-63A	IntelliTone Pro 200 Probe
CLIP-SET	RJ45 to 8 – Clip Test Lead
CIQ-RJA	RJ45/11 Modular Adapter
CIQ-COAX	Coax Adapter Kit for RCA, BNC
MS2-CPK	MicroScanner² Professional Kit Carry Case

Specifications and availability subject to change.

Specifications

Test Connectors	Twisted-pair: UTP, FTP, SSTP 8-pin modular jack accepts RJ45 and RJ11 Coax: F-connector for 75 Ω, 50 Ω, 93 Ω cables
Cable Tests	Length (460 m or 1500 ft), wiremap to TIA-568A/B standards, remote ID locators
Tone Generator	IntelliTone digital tone: [500 KHz]; analog tones: [400Hz, 1KHz]
PoE Detection	Solicits and detects the presence of 802.3af compatible PoE devices
Ethernet Port Test	Advertised speed of 802.3 Ethernet ports (10/100/1000)
Power Source	Battery type: 2 AA alkaline batteries
Dimensions	3 in x 6.4 in x 1.4 in (7.6 cm x 16.3 cm x 3.6 cm)
Weight	13 ounces; 363 grams (batteries included)
Warranty	One year

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